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April 29, 2025

VIA PACER

Hon. José R. Almonte, U.S.M.J.
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, New Jersey 07102

RE: Eric Lunsford v. Rutgers University, et al.
Case No. 2:24-cv-04359-JXN-JRA

Dear Magistrate Judge Almonte:

This firm represents Defendants, Rutgers University (pled as "Rutgers University d/b/a University Correctional Healthcare") ("Rutgers") and Barrington Lynch, M.D. ("Dr. Lynch") in the above-referenced matter. With the consent of Plaintiff's counsel, we respectfully submit this joint request for an adjournment of the settlement conference currently scheduled for May 8, 2025.

On April 14, 2025, the Court granted the parties' joint request to extend the fact discovery deadline by 45 days, through May 29, 2025 (ECF No. 41), and entered the Fourth Amended Scheduling Order (ECF No. 42). As noted in the parties' previous letter, the extension was necessary to accommodate the scheduling and completion of depositions.

Since the entry of the Fourth Amended Scheduling Order, Rutgers' Rule 30(b)(6) deposition has been completed. The deposition of Dr. Lynch, the only individually named defendant, is expected to take place on either May 9 or May 12, 2025, following his return from vacation. We respectfully submit that the settlement conference will be more productive after Dr. Lynch's deposition has been completed and the factual record has been more fully developed.

Accordingly, and with Plaintiff's consent, we respectfully request that the May 8, 2025 settlement conference be adjourned to at least 30 days following Dr. Lynch's deposition (June 12, 2025).

We appreciate the Court's consideration of this request and thank Your Honor for Your attention to this matter.

Respectfully submitted,

NORRIS McLAUGHLIN, P.A.

/s/ Margaret Raymond-Flood
Margaret Raymond-Flood, Esq.

cc: Kaitlin McCaffrey, Esq. (via PACER)



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